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VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: WC Docket No. 20-445, Emergency Broadband Benefit Program

Dear Ms. Dortch:

On January 27, 2021, Rick Chessen, Jennifer McKee, and Steve Morris of NCTA – The Internet & Television Association (NCTA), Brian Hurley of ACA Connects, Angie Kronenberg, Chris Shipley, and Andrew Mincheff of INCOMPAS, Louis Peraertz of WISPA, and Steve Coran of Lerman Senter (on behalf of WISPA) (collectively the Associations), met by videoconference with Trent Harkrader, Jodie Griffin, Christian Hoefly, Jessica Campbell, Eric Wu, and Micah Caldwell of the Wireline Competition Bureau, to discuss the Commission’s implementation of the Emergency Broadband Benefit (EBB) Program recently established by Congress.¹

In the meeting, the Associations expressed strong support for the goal of reaching as many eligible households as possible through robust provider participation in the EBB Program. Congress wisely recognized that the EBB Program should be open to all interested providers, and not limited solely to existing Lifeline providers, because such an approach maximizes the choices available to consumers. The Associations explained that many of their members are not currently designated as Eligible Telecommunications Carriers (ETCs) and therefore the Commission will need to take a number of affirmative steps in its development of the EBB Program to facilitate and encourage their broad participation.

The Associations explained that it will be critically important for the Commission to make any necessary updates to USAC data systems and procedures, both to meet the needs of the EBB Program and to accommodate their use by non-ETCs. For the EBB Program to commence shortly after the Commission adopts rules, we encouraged the Commission to direct USAC to begin this process immediately. In particular, we proposed that non-ETC providers immediately

¹ See Public Notice, *Wireline Competition Bureau Seeks Comment on Emergency Broadband Connectivity Fund Assistance*, WC Docket No. 20-445, DA21-6 (Jan. 4, 2021).

should be provided with access to these systems, and with the necessary training and staff so that they will be able to use the systems on Day 1 of the EBB Program. If non-ETCs are not able to sign up customers and receive reimbursement on the same terms as existing Lifeline providers from the start, consumers will be deprived of the variety and quality of services that Congress intended the program to provide.

For similar reasons, the Associations also encouraged the Commission to establish an initial filing window for applications to participate in the program, rather than a rolling review process, and a single start date for all qualifying providers so that consumers are presented with a full array of competitive broadband choices. To quickly stand up the EBB program, we also encouraged the Commission to give providers as much flexibility as possible with respect to defining the specific service offerings that are available for the EBB program, the categories of households that may participate, and the verification processes that providers will use to qualify households.

Respectfully submitted,

/s/ Steven F. Morris

Steven F. Morris

cc: T. Harkrader
J. Griffin
C. Hoefly
J. Campbell
E. Wu
M. Caldwell